

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Revision of Parts 2 and 15 of the Commission's	)	ET Docket No. 03-122
Rules to Permit Unlicensed National	)	RM - 10371
Information Infrastructure (U-NII) devices in	)	
the 5 GHz band	)	
	)	

**REPLY COMMENTS OF INTEL CORPORATION**

Intel Corp. (Intel) hereby submits the following reply comment in response to the Notice of Proposed Rulemaking in the above-referenced proceeding. Intel is the world's largest semiconductor manufacturer and a leader in technical innovation. Intel is also a leading manufacturer of communications and networking chips and equipment.

Intel agrees with the overwhelming majority of commenters who commended the FCC for initiating this important rulemaking to permit unlicensed National Information Infrastructure (U-NII) devices in the 5.470-5.725 part of the 5 GHz band.

Intel's two main points were widely supported by the majority of the other commenters. In its filing Intel stated:

- The Commission correctly concluded that for systems where multiple devices operate under a central controller only the central controller is required to have DFS capability; and
- The proposed TPC rules are complete and no fixed trigger mechanism should be mandated.

With regard to the first point, Cisco, Airespace, Agere, AMD, IceFyre, Motorola,

Atheros, Nokia, LEA, Proxim, WFA, and the IEEE all agreed that where multiple devices operate under a central controller only the central controller is required to have DFS capability.

Likewise with regard to the second point, Airespace, Cisco, Agere, AMD, IceFyre, Motorola, Nokia, ITI, WFA, and the IEEE agreed that no specific trigger mechanism should be mandated. As stated by the IEEE,

Historically, the Commission has, laudably, gone to considerable lengths to make sure that its rules do not unduly constrain the development of new technologies and techniques. This issue is a perfect example of a situation where that philosophy can, and should, be applied. To specify a particular “trigger mechanism” for TPC, e.g., Received Signal Strength Indication (“RSSI”), for example, is an unnecessary requirement that will constrain receiver architectures unnecessarily.<sup>1</sup>

In addition two items that deserve noting. First, Intel agrees with several commenters<sup>2</sup> who suggest that specific parameters such as the minimum number of radar pulses needed for reliable detection of radar signals not be codified at this time. “The minimum number of pulses required for reliable detection of radar signals by the DFS mechanism is likely to be implementation dependent and need not/should not be codified in the Commission’s rules, in order to avoid constraining the future development of innovative approaches that may provide superior performance.”<sup>3</sup>

Second, with regard to the transition period, Intel agrees with a majority of commenters<sup>4</sup> suggested a “more prudent approach would be to key the transition periods to the availability of appropriate compliance testing procedures.”<sup>5</sup> Accordingly we believe that the transition period

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<sup>1</sup> Comments of IEEE @ 15

<sup>2</sup> See comments of Cisco, ITI, IEEE

<sup>3</sup> See Comments of IEEE @ 12

<sup>4</sup> See comments of Airespace, Cisco, Agere, TIA, IceFyre, WFA, IEEE

<sup>5</sup> See comments of CISCO @ 11

for compliance with the DFS requirement for the 5.250-5.350 GHz band be “keyed to the availability of Commission-approved test procedures, rather than the publication of the Report and Order in the Federal Register.”<sup>6</sup>

Mike Chartier  
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Respectfully submitted,

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<sup>6</sup> See comments of IEEE